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10 *Attorneys for Defendants Rushmore Loan Management Services LLC and U.S. Bank National*  
11 *Association, not in its Individual Capacity but Solely as Trustee for the RMAC Trust, Series*  
12 *2016-CTT (erroneously named as “U.S. Bank, National Association, as Trustee”)*

13 **UNITED STATES DISTRICT COURT**  
14 **FOR THE DISTRICT OF NEVADA**

15 DIMITRITZA TOROMANOVA,

16 Plaintiff,

17 vs.

18 FIRST AMERICAN TRUSTEE SERVICING  
19 SOLUTIONS, LLC; RUSHMORE LOAN  
20 MANAGEMENT SERVICES LLC, U.S.  
21 BANK NATIONAL ASSOCIATION, AS  
22 TRUSTEE; JUAN C. UNDA-LUQUIN AND  
23 MIGUEL UNDALUQUIN, AS TENANTS IN  
24 COMMON

25 Defendants.

Case No.: 2:18-cv-01482-APG-VCF

**DEFENDANT RUSHMORE LOAN  
MANAGEMENT SERVICES LLC AND  
U.S. BANK TRUST’S MOTION TO  
EXTEND TIME TO FILE RESPONSE  
TO PLAINTIFF’S MOTION FOR  
RELIEF FROM ORDER AND  
JUDGMENT – FRCP 60 (FIRST  
REQUEST)**

26 Defendants Rushmore Loan Management Services LLC and U.S. Bank National  
27 Association, not in its Individual Capacity but Solely as Trustee for the RMAC Trust, Series  
28 2016-CTT (erroneously named as “U.S. Bank, National Association, as Trustee”)(hereinafter  
“Defendants”) hereby move to extend their deadline to file a response to Plaintiff’s Motion for  
Relief from Judgment and Order – FRCP 60 [ECF No. 137] to September 29, 2020.

On August 31, 2020, Plaintiff filed her Motion for Relief from Judgment and Order –  
FRCP 60 [ECF No. 137]. Defendants were served with the Motion on the same date. On  
September 8, 2020, Plaintiff filed Plaintiff’s Errata to Request for Judicial Notice in Support of  
Motion for Relief [ECF No. 138]. The deadline for Defendants to respond to the Motion and

1 Errata is September 15, 2020.

2 Defendants reached out to Plaintiff via email to inquire as to whether Plaintiff would  
3 agree to this extension. Plaintiff has not responded. Defendants seek the extension as they need  
4 additional time to prepare and complete their response to Plaintiff's Motion and Errata.

5 WHEREAS, Defendants move this Court to extend their deadline to file a response to  
6 Plaintiff's Motion for Relief from Judgment and Order – FRCP 60 [ECF No. 137] and Errata to  
7 Request for Judicial Notice in Support of Motion for Relief [ECF No. 138] to September 29,  
8 2020.

9 This is Defendants' first request to extend the time to file a response to the Plaintiff's  
10 Motion and Errata. The extension is requested in good faith and is not for purposes of delay or  
11 prejudice to any other party.

12 DATED this 14th day of September, 2020.

13 WRIGHT, FINLAY & ZAK, LLP

14 /s/ Ramir M. Hernandez, Esq.

15 Darren T. Brenner, Esq.

16 Nevada Bar No. 8386

17 Ramir M. Hernandez, Esq.

18 Nevada Bar No. 13146

19 *Attorneys for Defendants Rushmore Loan*

20 *Management Services LLC and U.S. Bank National*

21 *Association, not in its Individual Capacity but*

22 *Solely as Trustee for the RMAC Trust, Series 2016-*

23 *CTT (erroneously named as "U.S. Bank, National*  
24 *Association, as Trustee)*

25 IT IS SO ORDERED:

26   
27 UNITED STATES DISTRICT COURT JUDGE  
28

DATED: September 15, 2020

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP; that service of the foregoing **DEFENDANT RUSHOMORE LOAN MANAGEMENT SERVICES LLC AND U.S. BANK TRUST'S MOTION TO EXTEND TIME TO FILE RESPONSE TO PLAINTIFF'S MOTION FOR RELIEF FROM ORDER AND JUDGMENT – FRCP 60 (FIRST REQUEST)** was made on the 14<sup>th</sup> day of September, 2020, to all parties and counsel as identified on the Court-generated Notice of Electronic Filing system and/or by depositing a true and correct copy of the same in the U.S. Mail, certified mail, and/or registered mail, addressed as follows:

Dimitritza H. Toromanova  
P.O. Box 19153  
Las Vegas, NV 89132

/s/ Jason Craig  
An Employee of WRIGHT, FINLAY & ZAK, LLP